

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**AT CHARLESTON**

**UNITED STATES OF AMERICA,**

**v.**

**Case No. 2:20-cr-00054**

**NEDELTCHO VLADIMIROV,**

**Defendant.**

**DEFENDANT'S MOTION FOR AN EXTENSION OF  
TIME TO FILE SENTENCING MEMORANDUM**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves this Honorable Court to Extend the present deadline of January 5, 2022, to file Sentencing Memorandum to January 7, 2022. In support thereof, the Defendant states as follows:

1. Defendant's counsel has been ill during the holidays.
2. Defendant's counsel needs additional time to file a proper Sentencing Memorandum.
3. An extension of an additional two (2) days would not prejudice any party in this matter.

THEREFORE, the Defendant moves this Honorable Court to extend by an additional two (2) days to January 7, 2022, to file his Sentencing Memorandum and for such other and further relief as this Court deems just.

**NEDELTCHO VLADIMIROV**

By Counsel.

**CICCARELLO, DEL GIUDICE & LAFON**

By: /s/Timothy J. LaFon

Timothy J. LaFon (#2123)  
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Phone: (304)344-4440  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I, Timothy J. LaFon, do hereby certify that the foregoing **“Defendant’s Motion for An Extension of Time to File Sentencing Memorandum”** has been served upon all parties via the Court’s electronic filing system on the 4<sup>th</sup> day of January, 2022:

Andrew Tessman, Esquire  
United States Attorney’s Office  
P.O. Box 1713  
Charleston, West Virginia 25326

**CICCARELLO, DEL GIUDICE & LAFON**

By: /s/Timothy J. LaFon  
Timothy J. LaFon (#2123)  
Attorney for Defendant